

A10 86. (New) The system of claim 24, wherein said determining means comprises a database designating at least one of certain types of documents and particular senders for which document delivery is to be forgone.

Remarks

I. General

Claims 1-86 are now pending in the present application. Claims 1-85 stand rejected under 35 U.S.C. § 103. Applicants respectfully traverse the Examiner's rejection of the claims and respectfully request reconsideration of the rejections of record in light of the claim amendments presented herein and the arguments presented herein below.

Applicants have amended the specification to include update information with respect to the referenced patent applications to include patent numbers of those applications now issued as patents. Additionally, Applicants have amended the specification to correct an error detected in preparing this amendment. No new matter has been added.

Applicants have amended claim 42 to correct an informality detected in preparing this amendment. Similarly claim 68 has been amended to properly depend from claim 66 which provides antecedent basis for the limitation contained therein. No new matter has been added.

Applicants have amended claims 57-74 to affirmatively recite structural limitations substantially without reciting means plus function language as provided for under 35 U.S.C. § 112, sixth paragraph. It is believed that these amendments have retained substantially the same limitations as originally submitted with any change in claim breadth being dictated by case law addressing the differences between these two claim formats. Accordingly, no new matter has been added.

II. The 35 U.S.C. § 103 Rejections

Claims 1-12, 14-18, 21-51, and 53-56 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Micali*, U.S. Patent No. 5,629,982 (hereinafter *Micali*), in view of *Kuzma*, U.S. Patent No. 5,771,298 (hereinafter *Kuzma*). Claims 19 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Micali* in view of *Kuzma* in further view of *Talmadge*, U.S. Patent No. 4,858,138 (hereinafter *Talmadge*). Claims 57-74 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Micali* in view of *Kuzma* and *Talmadge* in further view of well known prior art. Claims 13, 52, and 75-85 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Micali* in view of *Kuzma* and in further view of *Hoffman et al.*, U.S. Patent No. 5,613,012 (hereinafter *Hoffman*).

To establish a prima facie case of obviousness, three basic criteria must be met, see M.P.E.P. § 2143. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Without conceding the second criteria, Applicant respectfully asserts that the references lack proper motivation to combine in addition to lacking all the claim limitations.

A. Neither *Micali* nor *Kuzma* Teach or Suggest All Limitations of Independent Claims 1, 27, and 32

Independent claims 1, 27, and 32 are rejected over *Micali* in view of *Kuzma*. In rejecting independent claims 1 and 27, the Office Action states that *Micali* discloses “mean for selecting third location discrete from first location and second location” referring to Figure 1 item T for support. However, Applicants’ review of *Micali* does not reveal any disclosure of selecting a third location, instead simply teaching that the use of a trusted party (T of Figure 1) enables an electronic transaction in which the first party has a message for the second party, see column 3, lines 51-55.

To aid the Examiner in understanding the present invention as recited in claims 1 and 27, attention is directed to the specification at page 7, lines 4-15, and page 32, lines 15-25. Therein it is taught that “[t]he particular letter server to which the link is established may be determined through reference to a ZIP code, for example, in the recipient’s address[, or] the link may be established indirectly through a central office which determines a proper letter server to handle the particular document being transmitted.” Accordingly, and as reflected in independent claims 1 and 27 as submitted, embodiments of the present invention provide for “selecting said third location,” which is neither taught or suggested by the disclosure of *Micali*.

Moreover, Applicants have amended independent claim 1 to more fully recite selection of the third location as set forth in the specification at page 32, lines 15-25, and substantially as originally submitted in claims 58, 59, and 60. Accordingly, claim 1, as amended, recites

selection of said third location by said selecting means is at least in part determined through reference to a document transmitting attribute selected from the group consisting of proximity of said third location to said second location, association of said third location with said first location, and a proper third location to handle a particular document being transmitted

Applicants respectfully assert that the disclosure of *Micali*, lacking any hint or suggestion of selecting a particular trusted party location, cannot be read to teach or suggest means for selecting as recited in amended claim 1.

With respect to claims 1 and 32, the Office Action asserts that *Micali* discloses “means at least in part operable at third location for producing a confirmation of receipt of received electronic document” referring to Figure 1 item 2-A for support. Applicants respectfully point out that claim 1 recites “means at least in part operable at said third location for receiving said document[, and] means at least in part operable at said third location for producing a confirmation of receipt of said received electronic document” Similarly, claim 32 recites a step of receiving the document at a way location which includes the step of “producing a confirmation of receipt of said received electronic document.” Accordingly, the recited conformation of receipt is

confirmation of receipt of the document by the third or way location. In order to make this limitation of claims 1 and 32 more clear, Applicants have amended these claims to expressly recite “producing a confirmation of receipt of said received electronic document confirming receipt at said third location . . .” and “producing a confirmation of receipt of said received electronic document confirming receipt at said way location . . .” respectively.

In contrast *Micali* discloses, in the Sending Receipt method and the Return Receipt method, a receipt not for the receipt of the document by the trusted party (third location) but of transmission to Bob (second location), column 7, lines 37-38, and/or a receipt of the document delivery to Bob (second location), column 12, lines 13 and 23-25. There is no hint or suggestion of a confirmation of receipt of the electronic document at the third or way location as recited in claims 1 and 32. In fact, the disclosure of *Macali* actually teaches away from the confirmation of these claims in teaching that “[t]he simultaneity of the transaction is not affected by the order in which the Post Office sends the encrypted message to Bob and the receipt to Alice[, but w]hat matters is that it sends both of them or none . . .” column 7, lines 31-34. Accordingly, *Micali* teaches that no receipt is sent to Alice (first location) unless the message has been sent to Bob (second location). M.P.E.P. § 2141.02 directs that “[a] prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention.” Additionally, “[i]t is improper to combine references where the references teach away from their combination,” M.P.E.P. § 2145. Therefore, Applicants respectfully assert that it is improper to modify the system of *Micali* in attempting to establish a 35 U.S.C. § 103 rejection meeting the present claims.

Further, independent claims 1 and 27 recite “means at least in part operable at said third location for reproducing . . . said electronic document in a plurality of different formats.” Similarly, independent claim 32 as submitted recited reproducing said received document according to a selected format, and has been amended to expressly recite that the format is selected from a plurality of formats. The Office Action asserts that this limitation is disclosed by *Micali* at column 4, lines 62-67, and

column 5, lines 1-2. However, Applicants' review of this portion of *Macali* does not reveal the claimed limitation. Although *Micali* discloses that a computer, telephone, fax, or broadcast network may be used, column 4, lines 59-62, there is no hint or suggestion of the reproduction of an electronic document in a format of a plurality of different formats, as the disclosure of *Micali* contemplates the use of common equipment at the sender and receiver locations. Specifically, *Micali* teaches that "it is assumed that each user in the system has a computer capable of sending and receiving messages to and from other computers via proper communication channels," column 4, lines 62-65. Accordingly, this limitation of independent claims 1, 27, and 32 is neither taught nor suggested by the disclosure of *Micali*.

With respect to independent claim 32, the Office Action concedes that *Micali* does not disclose verifying an indication of pre-payment for document transmission, but asserts that *Kuzma* discloses such a step and, therefore, concludes that the claimed invention would have been obvious under 35 U.S.C. § 103. However, it is well settled that the prior art must suggest the desirability of the claimed invention, M.P.E.P. § 2143.01. Neither *Micali* nor *Kuzma* contain any suggestion, either express or implied, that they be combined in the manner suggested by the Examiner. The motivation supplied in the Office Action is merely a statement of the purpose of the system of *Kuzma*, see column 3, line 61, through column 4, line 1. However, as *Kuzma* is an individually complete reference in itself, purportedly achieving this statement of purpose, there would be no reason to use parts from or add or substitute parts to another reference if the Examiner's proffered motivation is followed. The teaching or suggestion to make the claimed combination must be found in the prior art, not in Applicants' disclosure. See M.P.E.P. §2143, citing *In re Vaeck*, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991). Thus, the motivation to combine provided by the Examiner is improper, as the motivation must be described in a prior art reference and must detail the benefits of such a modification.

It is equally well settled that the fact that references can be combined or modified is not sufficient to establish a prima facie case of obviousness, M.P.E.P. §2143.01. The language of the recited motivation is circular in nature, stating that it is

obvious to make the modification because it is obvious to achieve the result. Such language is merely a statement that the reference can be modified, and does not state any desirability for making the modification. The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. In re Mills, 916 F.2d 680, 16 U.S.P.Q.2d 1430 (Fed. Cir. 1990), as cited in M.P.E.P. §2143.01. Thus, the motivation provided by the Examiner is improper, as the motivation must establish the desirability for making the modification.

As shown above, each of independent claims 1, 27, and 32 include new and non-obvious differences over the applied art and proffered combinations thereof. Accordingly, Applicants respectfully assert that these claims are allowable over the rejections of record. Moreover, as claims 2-26, 28-31, and 33-56 include additional new and non-obvious elements, the claims dependent from claims 1, 27, and 32 are, *a fortiori*, allowable over the rejections of record.

B. None of *Micali*, *Kuzma*, *Talmdage*, or Well Known Prior Art Teach or Suggest All Limitations of Independent Claim 57

Independent claim 57 is rejected over *Micali*, *Kuzma*, and *Talmdage* as applied to claims 1-12, 14-51 and 53-56, discussed above, in further view of well known prior art. In rejecting independent claim 57, the Office Action states that *Micali*, *Kuzma* and *Talmdage* discloses all of the limitations except "receiving means comprises means for electronically receiving transmitted information including means for converting transmission to electronic form if transmitted information is not initially in electronic form," relying on a well known facsimile system to meet this element of the claim.

Applicants respectfully assert that the Examiner is relying on unpermissible hindsight in order to piece together the elements of the claims based on knowledge gleaned from Applicants' disclosure. It is well settled that the prior art must suggest the desirability of the claimed invention, M.P.E.P. §2143.01. However, the motivation for modifying the collage of *Micali*, *Kuzma*, and *Talmdage* to include the proffered facsimile system is that placing a facsimile system at the receiving location or Post

Office in the *Micali* system and to have it convert a document in human readable form to electronic form “could provide a convince [sic: convenience?] for the sender to transmit a message.”

However, the specification accompanying the present claims details a robust transmission way location adapted to accommodate a broad spectrum of transmission location configurations, including Internet, facsimile, and tangible hard copies, for reproduction (physical or otherwise) and subsequent delivery to an intended recipient in a desired format, see page 8, line 18, through page 9, line 21. This robust way or intermediate location is reflected in claim 57 as including “a converter circuit adapted to electronically receive said transmitted information and to convert said transmission to electronic form if said transmitted information is not initially in electronic form” as well as “a reproducing circuit adapted to reproduce said information in human readable form” In contrast, a facsimile system is simply placed at either end of a transmission to provide conversion of a tangible copy to electronic form at a sending location and provide conversion of the electronic form to a tangible copy at the receiving location. There is no hint or suggestion from the conventional use of a facsimile system to provide conversion of a tangible copy into an electronic form at a receiving location. Indeed, the Examiner’s proffered reference, Patel et al., does not teach converting a transmission to electronic form at a receiving location if it is not initially in electronic form, but rather teaches routing of e-mail messages (electronic mail messages) for electronic faxing to a receiving location in order to make available Internet services to users who lack Internet access, see page 66. Applicants assert that without the teachings of Applicants’ disclosure one of ordinary skill in the art would not find it obvious to dispose a facsimile system at a receiving location to convert a transmission to electronic form if the transmitted information is not initially in electronic form.

Moreover, the Examiner concedes that *Micali* in view of *Kuzma* does not meet the limitation providing for an indicia authorizing delivery of the human readable information to the selected location as recited in claim 57. To address this deficiency, the Examiner proffers the disclosure of *Talmadge*. However, the disclosure of

Talmadge teaches that the host computer controls the printing of an indicia on the document, column 8, lines 48-52. It is the sender's computer of *Kuzma* which must be read to correspond to the host computer of *Talmadge*, see column 4, lines 45-48. Accordingly, even if proper motivation for combining these references could be found, the resulting structure would not meet the present claims wherein the intermediate station prints an indicia.

Furthermore, claim 57 recites "an acknowledgment circuit adapted to produce an acknowledgment of receipt of said transmitted information." As discussed above with respect to claims 1 and 32, the art relied upon by the Examiner does not meet this element of the claims. Specifically, Applicants point out that the recited conformation of receipt is confirmation of receipt of the document by the intermediate location. However, *Micali* discloses, in the Sending Receipt method and the Return Receipt method, a receipt not for the receipt of the document by the trusted party (third location) but of transmission to Bob (second location), column 7, lines 37-38, and/or a receipt of the document delivery to Bob (second location), column 12, lines 13 and 23-25. As provided in detail above with respect to claims 1 and 32, there is no hint or suggestion of a confirmation of receipt of the electronic document at the intermediate location as recited in claim 57.

As shown above, independent claim 57 includes new and non-obvious differences over the applied art and proffered combinations thereof. Accordingly, Applicants respectfully assert that this claim is allowable over the rejections of record. Moreover, as claims 58-74 include additional new and non-obvious elements, the claims dependent from claim 57 are, *a fortiori*, allowable over the rejections of record.

C. None of *Micali*, *Kuzma*, or *Hoffman* Teach or Suggest All Limitations of Independent Claim 75

Independent claim 75 is rejected over *Micali* and *Kuzma* as applied to claims 1-12, 14-51 and 53-56, discussed above. Similar to limitations discussed above with reference to claims 1 and 27, claim 75 recites means for selecting a third location discrete from the first and second locations. In rejecting independent claims 1 and 27,

the Office Action states that *Micali* discloses “mean for selecting third location discrete from first location and second location” referring to Figure 1 item T for support. As previously stated, Applicants’ review of *Micali* does not reveal any disclosure of selecting a third location, but rather simply teaches that the use of a trusted party (T of Figure 1) enabling an electronic transaction in which the first party has a message for the second party, see column 3, lines 51-55. Moreover, claim 75 as submitted further recites “said selection being based at least in part on a relative position of said third location to one of said first and said second locations.” Applicants respectfully assert that the disclosure of *Micali*, lacking any hint or suggestion of selecting a particular trusted party location, cannot be read to teach or suggest means for selecting as specifically recited in claim 75.

Claim 75 also recites “means for producing and transmitting a confirmation of receipt of said received electronic document to said first location.” As discussed above with respect to claims 1, 32, and 57, the art relied upon by the Examiner does not meet this element of the claims. Specifically, Applicants point out that the recited conformation of receipt is confirmation of receipt of the document by the intermediate location. However, *Micali* discloses, in the Sending Receipt method and the Return Receipt method, a receipt not for the receipt of the document by the trusted party (third location) but of transmission to Bob (second location), column 7, lines 37-38, and/or a receipt of the document delivery to Bob (second location), column 12, lines 13 and 23-25. As provided in detail above with respect to claims 1 and 32, there is no hint or suggestion of a confirmation of receipt of the electronic document at the intermediate location as recited in claim 57.

Additionally, claim 75 recites “means for reproducing said received document as a physical document and an electronic document to be delivered to said second location.” The Examiner concedes that *Micali* does not teach structure meeting such a limitation. However, the Examiner asserts that such a limitation is conventional, citing the Hybrid Mail of Norway Post Service. The supporting documentation of the Hybrid Mail of Norway Post Service is dated 3/5/99, well after the filing date of the present application. A review of the text of this supporting documentation does not provide

any evidence or statement that systems or methods meeting the claim limitation were known to one of ordinary skill in the art at the time of the present invention, as the date of the document appears to be March 5, 1999, and the historical information provided therein does not establish an earlier date for any relevant subject matter. Accordingly, the Examiner is hereby requested, under 37 C.F.R. §1.104(d)(2), to provide and make of record an affidavit setting forth his data showing such a limitation was known at the time the invention was made as specifically as possible for the assertion. Alternatively, under M.P.E.P. § 2144.03, the Examiner is hereby requested to cite a reference in support of the assertion. Otherwise the rejection of record with is respectfully requested to be withdrawn.

As shown above, independent claim 75 includes new and non-obvious differences over the applied art and proffered combinations thereof. Accordingly, Applicants respectfully assert that this claim is allowable over the rejections of record. Moreover, as claims 76-85 include additional new and non-obvious elements, the claims dependent from claim 75 are, *a fortiori*, allowable over the rejections of record.

D. The Dependent Claims Add Additional Limitations Not Taught or Suggested by the Art of Record

The dependent claims include additional new and nonobvious limitations not taught or suggested by the proffered combinations of *Micali*, *Kuzma*, *Talmadge*, *Hoffman*, or well known art. Limitations of ones of the dependent claims are substantially those presented in various ones of the independent claims discussed above. Accordingly, these limitations have not been discussed with reference to the dependent claims, although Applicants assert that the corresponding above arguments also establish that these dependent claims are not obvious under 35 U.S.C. § 103 over the art of record.

Claims 2 and 33 recite time stamping the transmitted document according to a secure real time clock in communication with the transmitting means. Similarly, claims 10 and 80 recite a credit storage device including an internal time device wherein the transmitted document includes time information provided by the internal time device.

Claim 72 recites use of a secure time piece disposed at the transmitting location. As described in the specification at page 7, lines 16-28, a secure portable processor device coupled to the system transmitting the document is taught to provide a trusted time stamp. Although the Examiner asserts that this limitation is taught by *Micali*, Applicants' review of *Micali* does not reveal the use of a time device or a time stamp meeting the claims. For example, the portion of *Micali* relied upon by the Examiner, column 6, lines 53-56, does not teach or suggest the use of a secure real time clock, but rather merely mentions additional information, such as time information, may be included in the transmission.

Claims 12 and 52 recite additional information transmitted with the transmitted document which provides instructions regarding the delivery of the transmitted document to the second location. Similarly, claim 73 recites including specific delivery information indicating selection of at least one delivery option of a plurality of delivery options. Page 25, line 26, through page 26, line 2, the specification accompanying claims 12 and 52 teaches:

For example, ancillary information accompanying the electronic document transmission may indicate the sender's desire to have the document specially handled by the delivery service. Such special handling may include such services as expedited delivery, registered delivery, the return of a delivery receipt, or any other service available by the delivery service.

Although the Examiner asserts that this limitation is disclosed by *Micali* at column 5, lines 65-67, and column 6, line 1, Applicants respectfully disagree. The referenced portion of *Micali* merely teaches that other information "such as recipient, time, transaction type, sender and recipient" may be included. Moreover, Applicants assert that there is no hint or suggestion within the disclosure of *Micali* which would have lead one of ordinary skill in the art to the invention of these claims.

Claim 13 recites the additional information provided with the transmitted document comprising instructions regarding storage of a copy of the transmitted document. Similarly, claim 81 recites archiving the electronic document at the third location. In rejecting claims 13 and 81, the Office Action states that *Micali* and

Kuzma discloses all of the limitations except “an additional information comprises instructions regarding storage of a copy of transmitted document by receiving means,” but asserts that the disclosure of *Hoffman* meets this element of the claims. The Examiner offers as motivation for modifying *Micali* and *Kuzma* to include storage of a transmitted document that such a combination would provide a convenience for the sender to retrieve the prior message. However, the sender, by definition, must already have a copy of the prior message. It is well settled that the prior art must suggest the desirability of the claimed invention, M.P.E.P. § 2143.01. As conceded by the Examiner, *Micali* and *Kuzma* are completely silent with respect to storage of a transmitted document. Moreover, *Hoffman* does not detail any desirability for storage of documents transmitted by the system of the present invention by the bald statement that “[i]ndividuals wishing to archive the document, along with an indication of all of the individuals to whom the message was sent may submit message archival requests prior to the deletion of the message,” column 34, lines 7-10. Accordingly, Applicants respectfully assert that the invention of claims 13 and 81 is not obvious over the art of record.

Claim 14 recites, read with claim 1 from which it depends, formatting, from a plurality of formats, the received document according to a predetermined protocol for delivery. This simply is not taught or suggested by *Micali* as asserted by the Examiner. For example, the disclosure cited by the Examiner at column 6, lines 57-67, and column 7, lines 1-13, merely teaches transmission of information enabling Bob to retrieve Alice’s message. There is no suggestion of formatting the received document, from a plurality of formats, according to a predetermined protocol for delivery.

With respect to claims 24 and 25, the Examiner asserts that *Micali* teaches means for determining a particular method of delivery and that *Micali* must have a database of preferred delivery methods such as by traditional certified mail delivery. Claim 42 reciting the selected format being indicated by information transmitted with the document stands rejected similarly. Applicants assert that the means for determining a particular method of delivery of claim 24 or of a particular format is not met by the disclosure of *Micali*. Instead, *Micali* teaches that if a proper receipt of

delivery is not received from Bob (the second location), the Post Office (the third location) may take action to deliver Alice's (the first location) message in a way that is guaranteed to produce a return-receipt, column 12, lines 35-47. There is no determination made as to a particular method of delivery in *Micali*, but rather a second method of delivery which is used in the event of a failure of a first method of delivery. In contrast, as taught at page 15, lines 5-28, of the specification of the present application, different delivery methods are available to documents transmitted to the letter server, so a determination is made as to a desired delivery method, such as by a sender or recipient indicating a preferred method of delivery.

In rejecting claims 25 and 43, reciting the use of a database in determining format or delivery method, the Examiner asserts that *Micali* must have a database. Applicants presume the Examiner is asserting such a limitation is inherent in *Micali*. In order to properly establish a rejection based on inherency, "the Examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristic necessarily flows from the teachings of the applied prior art," M.P.E.P. § 2112, citing Ex parte Levy, 17 U.S.P.Q.2d 1461, 1464 (Bd. Pat. App. & Inter. 1990) (emphasis original). A reference may not be anticipating under the principle of inherency on the basis of possibilities or probabilities, as anticipation by inherency requires that persons skilled in the art would recognize that the missing material is "necessarily present" in the reference, see In re Robertson, Fed. Cir., No. 98-1270, 2/25/99. The Examiner's statement that "*Micali* must have a database of preferred delivery methods such as by traditional certified mail delivery to B with document print on paper or store in a computer diskette and by electronic mail" is asserted by Applicants to be insufficient to establish a database meeting the claims necessarily flows from the disclosure of *Micali*.

Moreover, Applicants have amended claims 25 and 43 recite the determination is made through reference to a database associating the particular method of delivery or format to the message sender and/or recipient. No new matter has been added as this subject matter is disclosed at page 38, lines 10-20, of the specification as filed. As described at page 38, lines 10-19, of the specification, a database may include

preferred delivery methods of various recipients or of various senders. Such a limitation simply is not taught or suggested by the art of record.

Additionally, new claim 86, depending from claim 24, has been added reciting a database of the determining means providing information as to particular types of documents and/or particular senders for which document delivery may be forgone, as described in the specification at page 15, lines 27-29. There is no hint or suggestion of providing for selective non-delivery by the disclosures of the art of record.

Claim 50 recites indication of pre-payment provided by a recipient of the transmitted document. However, the disclosure of *Kuzma*, relied upon by the Examiner in meeting this element of the claims, teaches only that, if the electronic stamp is not included or is otherwise invalid, transmission of the document is prevented, column 6, lines 13-17. Accordingly, there is no disclosure sufficient to meet the indication of pre-payment provided by the recipient, as recited in claim 50.

Claims 54 and 63 recite determining an address of the recipient location from information included in the electronic document. As described at page 24, lines 10-20, a preferred embodiment letter server (way location) is adapted to browse the transmitted document to isolate the recipient information included therein. Applicants assert that such a limitation is not met by *Micali*'s user system unique identifiers used in routing messages. Moreover, claim 64, dependent from claim 63, further recites means for verifying the accuracy of this determined delivery address information which is neither taught nor suggested by the art of record.

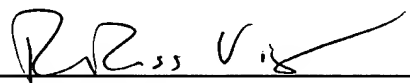
III. Summary

As shown above, there are great differences between the claims and the prior art. Moreover a person of ordinary skill in the art considering the prior art would not find these differences obvious. Accordingly, Applicants respectfully traverse the Examiner's 35 U.S.C. § 103 rejections of record. Therefore, Applicants respectfully request that the claims be passed to issue.

Applicant respectfully requests that the Examiner call him at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining problems.

Respectfully submitted,

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Date: June 8, 1999